



101 Constitution Ave. N.W. Suite 325E
Washington, D.C. 20001
Tel 202.312 8087
Fax 202.312 8061

May 12, 2005

Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Ex parte communication, WC Docket 04-36

Dear Ms. Dortch:

Pursuant to section 1.1206 of the Commission's rules, this letter will serve as notification of an oral ex parte presentation via teleconference on May 12, 2005 in the referenced proceeding to Michelle Carey, Chairman Martin's legal advisor. Nortel participants in the meeting were Martin Dawson, Mark Lewis, Scott Carlson and the undersigned.

In its oral presentation, Nortel pointed out the desirability of E911 capability for VoIP service. Nortel suggested that consumers, carriers and equipment providers would benefit from the regulatory certainty resulting from a Commission ruling. The presentation also pointed out longer term deficiencies of a solution which would rely primarily on consumer interaction. Included among these deficiencies are 1) the efficacy of such a solution for those consumers who change their location; who do not know their location; or who input their location improperly and 2) the potential for denial of service attacks targeting a particular PSAP in view of the ability of a VoIP subscriber to selectively input locations and numbers not representative of their actual physical location.

Any E911 VoIP solution that is intended to address the above described reliability and security concerns will need to be based on an architecture that generates user location independent of consumer input. With such a solution, the user of the location information (the emergency network) can be confident that the source of the location information comes from a recognized, dependable, and accountable source. Nortel pointed out that the architectural solutions for these shortcomings are currently well understood, and that industry standards development is underway.

If you have any questions, please call me.

Sincerely yours,

/S/

Raymond L. Strassburger
Vice President and Senior Washington Counsel

Copy: Michelle Carey